

## Robert Rush

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**From:** Grant Fitz <Grant@rodolftodd.com>  
**Sent:** Wednesday, May 13, 2015 9:15 AM  
**To:** Robert Rush  
**Cc:** Stacy Smith  
**Subject:** Re: Harvey deposition

Ha. I guess that's why it was open on my calendar.  
Ill let you know once I meet with people today who the designee is and the location. I'll get back with you.

On May 13, 2015, at 9:07 AM, Robert Rush <[rrush@loganlowry.com](mailto:rrush@loganlowry.com)> wrote:

Grant

The 25<sup>th</sup> is Memorial Day. I doubt you will get any volunteers to sit for a deposition. The 27<sup>th</sup> works for me. Let's get it set on the 27<sup>th</sup>. Do you want to do the deposition at Wagoner Hospital?

Also, please let me know who will be designated.

Bob

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**From:** Grant Fitz [<mailto:Grant@rodolftodd.com>]  
**Sent:** Wednesday, May 13, 2015 8:39 AM  
**To:** Robert Rush  
**Subject:** RE: Harvey deposition

I can't do any of those dates...next week is a complete mess.

I am available the 25, 26, 27, 29. Any of those work?

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**From:** Robert Rush [<mailto:rrush@loganlowry.com>]  
**Sent:** Wednesday, May 13, 2015 8:35 AM  
**To:** Grant Fitz  
**Subject:** RE: Harvey deposition

Grant

Let's see what dates we can get. I can do it the 15<sup>th</sup>, 18<sup>th</sup> or the 20<sup>th</sup>.

Bob

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**From:** Grant Fitz [<mailto:Grant@rodolftodd.com>]  
**Sent:** Wednesday, May 13, 2015 8:33 AM  
**To:** Robert Rush; Jason Rush

EXHIBIT "A"

**Cc:** Stacy Smith; Beth Meeker  
**Subject:** RE: Harvey deposition

Mr. Rush,

As you may know, Jason is currently preparing for a jury trial and I will be the one to present a corporate representative to address your subpoena regarding Dr. Gorospe's credentialing file.

I currently have 3 nurse depositions on another case scheduled on May 19<sup>th</sup>, which have been scheduled for a while...therefore, May 19<sup>th</sup> does not work for me. This morning I have a meeting at Wagoner and will be talking with them about possible dates. Can we agree to strike the May 19<sup>th</sup> date...and I will get you new dates once I'm done with my meeting today?

Just let me know. Thanks.

**Grant A. Fitz**

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